

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

Thomas M. Shaw, Gregory L. Shaw and
Susan C. Shaw,

Plaintiffs,

vs.

JPMorgan Chase Bank N.A., d/b/a Accent
Mortgage, LLC, The Hoffman Group, Inc.,
Accent Appraisal Services, Inc., Kersi S.
Shroff, a.k.a Casey Shroff, Shroff Finance,
LLC, Hoffman Corporation, and Walter J.
Witkowski,

Defendants.

Case No: 4:11-cv-01699-MGL

**REPOSE IN OPPOSITION TO
PLAINTIFFS' MOTION TO COMPEL SETTLEMENT**

Defendant JPMorgan Chase Bank, N.A.¹ ("Chase") submits this memorandum in opposition to Plaintiffs' Motion to Compel Settlement. Plaintiffs argue that Chase has failed to comply with its obligations in a confidential settlement agreement between the parties dated October 23, 2013 ("Settlement Agreement"), but the motion fails to direct Chase or the Court to a single provision in the Settlement Agreement with which Plaintiffs contend Chase failed to comply. On the contrary, Chase maintains that it has not breached any provision in the Settlement Agreement. Furthermore, Chase asserts that there is no provision in the Settlement Agreement that would entitle Plaintiffs to the relief requested in their motion. Therefore, the Court should deny Plaintiffs' motion to compel settlement.

¹ JPMorgan Chase Bank, N.A. is erroneously identified in the Complaint as JPMorgan Chase Bank, N.A., d/b/a Accent Mortgage, LLC.

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